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April 1, 2013

VIA ELECTRONIC FILING

Ms. Jocelyn Boyd
Chief Clerk and Administrator
South Carolina Public Service Commission
Synergy Business Park, The Saluda Building
101 Executive Center Drive
Columbia, South Carolina 29210

Re: South Carolina Telephone Coalition Petition to Modify Alternative Regulation Plans Filed Pursuant to S.C. Code Ann. § 58-9-576(B) to Take into Account Recent Action by the Federal Communications Commission; Docket No. 2013-55-C

Dear Ms. Boyd:

Please find attached for filing United Telephone Company of the Carolinas d/b/a CenturyLink's Response to the South Carolina Cable Television Association's Motion filed March 22, 2013 in the above-referenced matter.

By copy of this letter to all parties of record, I am serving a copy upon them. If you have any questions or need further information, please do not hesitate to contact me.

Sincerely,

ELLIOTT & ELLIOTT, P.A.



Scott Elliott

SE/mjl
Enclosure

cc: All parties of record w/enc.

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET 2013-55-C

In re)	
South Carolina Telephone Coalition)	RESPONSE TO MOTION
Petition to Modify Alternative Regulation)	OF SOUTH CAROLINA CABLE
Plans Filed Pursuant to S.C. Code Ann.)	TELEVISION ASSOCIATION
§ 58-9-576(B) to Take into Account Recent)	
Action by the Federal Communications Commission)	

Pursuant to R. 103-829 of this Commission's rules of Practice and Procedure, intervenor United Telephone Company of the Carolinas d/b/a CenturyLink ("CenturyLink" or "Petitioner"), by its undersigned attorneys, hereby files this Response to the Motion of the South Carolina Cable Television Association ("SCCTA"). In support of its Response, CenturyLink shows the Commission the following:

1. This docket concerns the request of the members of the South Carolina Telephone Coalition ("SCTC") to increase their respective maximum rates for basic residential service in order to meet and comply with the rate floors established by the Federal Communications Commission ("FCC") in its Order reforming intercarrier compensation and universal service.¹
2. SCCTA has intervened in this proceeding. While not protesting the rate increases sought by SCTC, SCCTA has requested that as part of this proceeding the Commission "*require the SCTC companies* to complete the appropriate forms for updating and adjusting the amount of

¹ See *Connect America Fund*, WC Docket No. 10-90, Report and Order and Further Notice of Proposed Rulemaking, FCC 11-161 (rel. Nov. 18, 2011) and Order on Reconsideration, FCC 11-189 (rel. Dec. 23, 2011). The ILEC Group also notes that the FCC's December 7, 2011 Order in this docket was amended by an Errata Order issued December 9, 2011 ("ICC/USF Reform Order").

subsidy each of them takes from the USF, and [to adjust the USF] based on that new information.” SCCTA Petition to Intervene at Paragraph No. 6, p. 3 (emphasis added).

3. CenturyLink intervened in this proceeding because it contributes to and receives funds from the USF. Thus, to the extent the Commission decides it would be appropriate to consider the issues raised by SCCTA regarding the USF in the context of this docket, CenturyLink has a direct and substantial interest in this matter.

4. On March 22, 2013, SCCTA filed a Motion seeking that the Office of Regulatory Staff (“ORS”) be allowed to make the confidential regular annual filings made by companies...receiving subsidies from the USF” available under an appropriate protective order. SCCTA asserts that “[t]hese documents are clearly relevant to determining how to adjust the USF and the SCCTA must have access to them in order to effectively advocate its position in this proceeding.” Motion at Paragraph No. 2, pages 1-2.

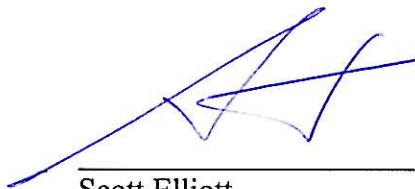
5. Setting aside whether SCCTA has presented reasonable grounds to justify grant of its Motion – and CenturyLink maintains SCCTA has not -- SCCTA’s Motion appears to seek access to the confidential annual USF filings of not only the SCTC companies, but also of other companies receiving funds from the USF such as CenturyLink. As such, SCCTA’s Motion is overbroad and improper. CenturyLink’s maximum rate for basic local service is not changing. Whatever basis SCCTA argues may exist under S.C. Code Section 58-9-280(E)(4) to review the size of the USF based on the maximum rate increases sought by the SCTC member companies² simply does not apply to CenturyLink. As noted in Paragraph 2 above, even SCCTA’s own Petition to Intervene recognizes that only the USF forms of the SCTC member companies would

² SCCTA Petition to Intervene in Docket No. 2013-55-C filed March 5, 2013, at p. 2.

be relevant to this matter. CenturyLink's confidential USF filings are outside the scope of this proceeding and their confidentiality should be maintained.

WHEREAS CenturyLink respectfully requests that the Commission deny SCCTA's Motion and grant all other relief that is just and proper.

Respectfully submitted,



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April 1, 2013

BEFORE
THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

Docket No. 2013-55-C

In re)	
South Carolina Telephone Coalition)	
Petition to Modify Alternative Regulation)	CERTIFICATE OF SERVICE
Plans Filed Pursuant to S.C. Code Ann.)	
§ 58-9-576(B) to Take into Account Recent)	
Action by the Federal Communications Commission)	

I, the undersigned employee of Elliott & Elliott, P.A., do hereby certify that I have this date served one (1) copy of the attached Response to Motion of South Carolina Cable Television Association upon the following parties causing said copy to be deposited with the United States Postal Service, first class postage prepaid and properly affixed thereto, and addressed as follows:

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Dated: April 1, 2013



MaryJo Lawracy, Legal Assistant